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Filing date: **01/10/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91213094
Party	Plaintiff Blue Cross and Blue Shield Association
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Submission	Other Motions/Papers
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Signature	/Susan G. O'Neill/
Date	01/10/2014
Attachments	Alkemi - Joint Stip to Repoen Applicant's Time to Respond.pdf(64635 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

IN RE: APPLICATION SERIAL NO. 85/778,843

BLUE CROSS AND BLUE SHIELD
ASSOCIATION,

Opposer,

v.

ALKEMI MANAGEMENT COMPANY, INC.,

Applicant.

Opposition No. 91213094

**JOINT STIPULATION TO REOPEN
APPLICANT'S TIME TO RESPOND TO
NOTICE OF OPPOSITION, AND TO EXTEND
DATES BY 30 DAYS**

Opposer Blue Cross and Blue Shield Association, and Applicant Alkemi Management Company, Inc., hereby agree and stipulate to reopen Applicant's time to file an answer to Opposer's Notice of Opposition, and to extend all other deadlines by 30 days. Applicant's time to answer expired on December 30, 2013. This stipulation seeks to have Applicant's time to answer reopened and set to close on January 29, 2014.

This stipulation is made pursuant to TMBP §§ 501 and 509 on the grounds that the parties are actively engaged in settlement discussions, and upon the recognition that good cause exists to excuse Applicant's default to allow the parties to seek amicable resolution of the matter without the need for motion practice.

The parties hereby stipulate and request that dates be reset as follows:

Time to Answer :	01/29/2014
Deadline for Discovery Conference :	02/28/2014
Discovery Opens :	02/28/2014
Initial Disclosures Due :	03/30/2014
Expert Disclosure Due :	07/28/2014

Discovery Closes :	08/27/2014
Plaintiff's Pretrial Disclosures :	10/11/2014
Plaintiff's 30-day Trial Period Ends :	11/25/2014
Defendant's Pretrial Disclosures :	12/10/2014
Defendant's 30-day Trial Period Ends :	01/24/2015
Plaintiff's Rebuttal Disclosures :	02/08/2015
Plaintiff's 15-day Rebuttal Period Ends :	03/10/2015

Respectfully submitted,

BLUE CROSS AND BLUE SHIELD ASSOCIATION

By *Susan O'Neill*
Susan G. O'Neill, Esq.
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Date: January 10, 2014

ALKEMI MANAGEMENT COMPANY, INC.

By: *Carl J. Spagnuolo*
Carl J. Spagnuolo
Attorney for Applicant
Alkemi Management Company, Inc.

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Date: January __, 2014

CERTIFICATE OF SERVICE

I, Laura Prongos, hereby certify that a true and complete copy of the foregoing JOINT STIPULATION TO REOPEN APPLICANT'S TIME TO RESPOND TO NOTICE OF OPPOSITION, AND TO EXTEND DATES BY 30 DAYS was served on the parties listed below by mailing said copies on January 10, 2014 via U.S. First Class Mail, postage pre-paid to:

Applicant's Attorney/Correspondent of Record:

Carl J. Spagnuolo
McHale Slavin, P.A.
2855 PGA Blvd.
Palm Beach Gardens, FL 33410

Dated: January 10, 2014

/s/ Laura Prongos

Laura Prongos